

IN THE UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF OKLAHOMA

W. A. DREW EDMONDSON, in his)
capacity as ATTORNEY GENERAL)
OF THE STATE OF OKLAHOMA and)
OKLAHOMA SECRETARY OF THE)
ENVIRONMENT C. MILES TOLBERT,))
in his capacity as the)
TRUSTEE FOR NATURAL RESOURCES))
FOR THE STATE OF OKLAHOMA,)

Plaintiff,)

vs.)

4:05-CV-00329-TCK-SAJ

TYSON FOODS, INC., et al,)

Defendants.)

THE DEPOSITION OF JOEL REED,
produced as a witness on behalf of the Plaintiff in
the above styled and numbered cause, taken on the
11th day of June, 2007, in the City of West Siloam
Springs, County of Delaware, State of Oklahoma,
before me, Lisa A. Steinmeyer, a Certified Shorthand
Reporter, duly certified under and by virtue of the
laws of the State of Oklahoma.

1 Q I'm sorry. What integrator did you first work
2 with?

3 A George's.

4 Q And the time frame you worked with George's is
5 what?

09:08AM

6 A '87 to '90.

7 Q Were you growing broilers?

8 A Yes.

9 Q And were you growing those at the same
10 location where you are today?

09:08AM

11 A Yes.

12 Q Have you worked for any other integrators
13 besides George's and your current integrator?

14 A Than my current integrator?

15 Q Yes, other than the one you are working for
16 now?

09:09AM

17 A No.

18 Q And the one you are working for now is who?

19 A Simmons.

20 Q And you've worked continuously for Simmons
21 since 1990 or sometime after?

09:09AM

22 A Yes, yes.

23 Q I sometimes talk a little fast and when we do
24 the deposition, I need to -- you need to wait until

25 I finish my answer and I'll try -- or finish my

09:09AM

1 growing operation?

2 A No.

3 Q Does Simmons conduct any grower meetings?

4 A No.

5 Q Has George's ever conducted grower meetings? 10:51AM

6 A No.

7 Q Are you a member of any type of an association
8 that's associated with poultry growing?

9 A Not with poultry growing I don't guess, no.

10 Q Are you a member of Poultry Partners? 10:51AM

11 A Yes.

12 Q We'll come back to that later, but as to
13 associations that would be regarding poultry growing
14 operations or things related to it, you're not a
15 member of any type of association? 10:52AM

16 A No.

17 Q Other than what you learned in growing up from
18 your parents, is there anyone that you refer to or
19 discuss with for ideas about improving or changing
20 your growing operations? 10:52AM

21 A Yeah, different poultry growers, field man.

22 Q Besides the field man, other poultry growers,
23 would those be Simmons growers also or a different
24 integrator?

25 A Some of them are Simmons; some of them are 10:52AM